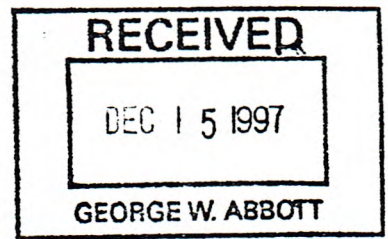


ANDREW H. WILSON

WILSON CAMPILONGO LLP
115 SANSOME STREET, SUITE 400
SAN FRANCISCO, CALIFORNIA 94104
(415) 391-3900
TELECOPY (415) 954-0938



December 12, 1997

Mr. George W. Abbott, Esq.
George W. Abbott, Chartered
P.O. Box 98
Minden, Nevada 89423

Re: Armstrong v. Church of Scientology of Texas, et al.
Our File No. SCI02-003

Dear Mr. Abbott:

After a review of the complaint in the referenced matter, I write to offer you and your client the opportunity to voluntarily dismiss the action without fear of facing a motion for sanctions under Rule 11 of the Federal Rules of Civil Procedure.

By signing the complaint, you have certified that the allegations contained therein are true and correct to the best of your knowledge and belief after reasonable inquiry. Any reasonable inquiry would have disclosed, and I am confident we will prove without question, that Mr. Armstrong was not a resident of Nevada when the complaint was filed. Mr. Armstrong was, and still is, a fugitive from California where he last maintained his residence and has been residing since that time in Canada. Filing this action in Nevada is a transparent attempt to avail your client of the benefits of Nevada's statute of limitation for defamation. We believe that this motivation will be quite evident to any court considering the matter.

It is also apparent that you have failed to perform even the most rudimentary investigation into the background of your client and the litigation between him and my client. If you had, you would know that the statements at issue are neither defamatory nor unprivileged. I suggest that you very carefully review the allegations of your complaint, the history of the litigation between our respective clients and the elements of the tort of defamation. I am confident that such a review will lead you to the conclusion that the claims made in your complaint are unfounded and should be dismissed.

Mr. George W. Abbott, Esq.
December 12, 1997
Page 2

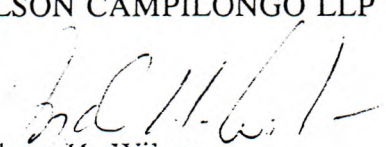
Perhaps the most egregious aspect of your complaint is that it revisits and attempts to recover for a "fifteen year[s]...course of conduct designed to destroy plaintiff Gerald Armstrong." I am flabbergasted that you could contend this in the face of the Settlement Agreement of December 1986, which expressly released all claims and which provided that the "slate was wiped clean." You should review the cross complaint filed by Mr. Armstrong in Church of Scientology International v. Gerald Armstrong, Marin County Superior Court Action No. 157680. That cross-complaint is based on facts virtually identical to those asserted in your complaint, and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals of res judicata and collateral estoppel with which I assume you are familiar.

Further evidence of the lack of care taken in preparing and filing the complaint is found in your designation of Marin County Action No. 157680 as a "related case," something which even the most inexperienced attorney would realize is inappropriate. I recognize Mr. Armstrong's hand in the language of the complaint and can only conclude that you did not even review it before it was filed.

I hope you take this opportunity to fully analyze the facts and applicable law before continuing this ill-conceived and fatally flawed litigation.

Very truly yours,

WILSON CAMPILONGO LLP



Andrew H. Wilson

December 16, 1997

Andrew H. Wilson, Esquire
Wilson Campilongo, LLP
115 Sansome Street, Suite 400
San Francisco, CA 94104

Re: Armstrong v. Miscavige, et al.
USDC for the District of Nevada
No. CV-N-97-670-ECR (RAM)

Dear Mr. Wilson:

I write in response to three comments made by you in your letter of December 12.

1. You write that "Filing this action in Nevada is a transparent attempt to avail [my] client of the benefits of Nevada's statute of limitation for defamation."

Filing this action in Nevada has nothing to do with statutes of limitation. It has to do with Mr. Armstrong's residence. You will recall that in my February 12 and 14, 1997 letter, to which you responded on February 25, I offered your clients the opportunity to correct the defamatory statements in the 1993 black PR publication and the 1996 Cathy Norman letter. You will see in my letter the statement: "If an understanding cannot be reached, and correction of this situation cannot be achieved, Mr. Armstrong is prepared to file a lawsuit for, inter alia, defamation, intentional infliction of emotional distress...." Since your clients chose to attack me and Mr. Armstrong rather than correct the situation, I filed the complaint on his behalf. It is clear that if anyone actually needed a "transparent attempt" to avail himself of the Nevada statutes, he would not have written a letter like mine of February 12 and 14.

Mr. Armstrong left California early this year because of threats from the Scientology organization and his need to have some measure of safety from those threats. Because his movements since leaving California have been brought about by their own unlawful actions, Scientology's principles and agents have no legal or moral basis for complaining about where he resides. He has been for some considerable time a resident of Nevada. *principles*

2. You write: "[The Armstrong IV] cross-complaint is based on facts virtually identical to those asserted in your complaint, and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals (sic) of res judicata and collateral estoppel with which I assume you are familiar."

As you know, Mr. Armstrong received your clients' defamatory documents in late November, 1996, and these documents were disseminated by your clients only a little more than a month earlier. The cross-complaint was filed some years earlier. The principles of res judicata and collateral estoppel are therefore inapplicable. If, however, you have some facts to support your assertion that these principles do apply in this defamation case I am interested in examining them.

3. You write that you offer me and my client "the opportunity to voluntarily dismiss the action without fear of facing a motion..."

I understand by this, and by the rest of your letter, that you have accepted service of the summons and complaint on behalf of the six named defendants: David Miscavige, RTC, CSI, Sea Org, CS Texas and Cathy Norman. Is this correct?

Assuming ~~my~~ this understanding is correct,

~~Finally~~, I am enclosing herewith a copy of the Minutes of the Court from December 2, 1997 ordering this action reassigned to the Honorable Edward C. Reed, Jr., and changing the case number to CV-N-97-670-ECR (RAM).

GEORGE W. ABBOTT, CHARTERED
Law Offices

December 17, 1997

Andrew H. Wilson, Esquire
Wilson Campilongo, LLP
115 Sansome Street, Suite 400
San Francisco, CA 94014

Re: Armstrong v. Miscavige
USDC for the District of Nevada
No. CV-N-97-670-ECR (RAM)

Dear Mr. Wilson:

I write in response to three comments made by you in your letter of December 12.

1. You write that "Filing this action in Nevada is a transparent attempt to avail [my] client of the benefits of Nevada's statute of limitation for defamation."

Filing this action in Nevada has nothing to do with statutes of limitations. It has to do with Mr. Armstrong's residence. You will recall that in my February 12 and 14, 1997 letter, to which you responded on February 25, I offered your clients the opportunity to correct the defamatory statements in the 1993 black PR publication and the 1996 Cathy Norman letter. You will see in my letter the statement: "If an understanding cannot be reached, and correction of this situation cannot be achieved, Mr. Armstrong is prepared to file a lawsuit for, inter alia, defamation, intentional infliction of emotional distress..." Since your clients chose to attack me and Mr. Armstrong, rather than correct the situation, I filed the complaint on his behalf. It is clear that if anyone needed a "transparent attempt" to avail himself of the Nevada statutes, he would not have written a letter like mine of February 12 and 14.

Mr. Armstrong left California early this year because of threats from the Scientology organization and his need to have some measure of safety from those threats. Because his movements since leaving California have been brought about by their own unlawful actions, Scientology's principals and agents have no legal or moral basis for complaining about where Mr. Armstrong resides. He has been for some considerable time a resident of Nevada.

2. You write: "[The Armstrong IV] cross-complaint is based on facts virtually identical to those asserted in your complaint,

Andrew L. Wilson, Esq.
December 17, 1997
Page Two

and was disposed of on summary adjudication, thus barring future assertion of any claims arising out of the same set of facts under the principals (sic) of res judicata and collateral estoppel with which I assume you are familiar."

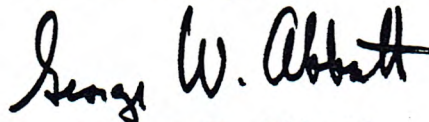
As you know, Mr. Armstrong received your clients' defamatory documents in late November, 1996, and these documents were disseminated by your clients only a little more than a month earlier. The cross-complaint was filed years earlier. The principles of res judicata and collateral estoppel are therefore inapplicable. If, however, you have facts to support your assertion that these principles do apply in this defamation case, I am interested in examining them.

3. You write that you offer me and my client "the opportunity to voluntarily dismiss the action without fear of facing a motion..."

I understand by this, and by the rest of your letter, that you have accepted service of the summons and complaint on behalf of the six named defendants: David Miscavige, RTC, CSI, Sea Org, Scientology Texas and Cathy Norman. Is this correct?

Assuming this understanding is correct, I am enclosing herewith a copy of the Minutes of the Court from December 2, 1997 ordering this action reassigned to the Honorable Edward C. Reed, Jr., and changing the case number to CV-N-97-670-ECR (RAM).

Sincerely,



George W. Abbott

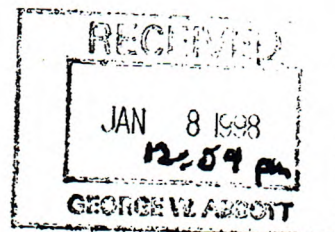
Enclosure

cc: Gerald Armstrong

ANDREW H. WILSON

WILSON CAMPILONGO LLP
 115 SANSOME STREET, SUITE 400
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 (415) 391-3900
 TELECOPY (415) 954-0938

January 6, 1998



Mr. George W. Abbott, Esq.
 George W. Abbott, Chartered
 P.O. Box 98
 Minden, Nevada 89423

Re: Armstrong v. Church of Scientology of Texas, et al.
 Our File No. SCI02-003

Dear Mr. Abbott:

I write in response to your letter of December 17, apparently received in this office on December 24. I was out of the office during the holidays and unable to respond until today.

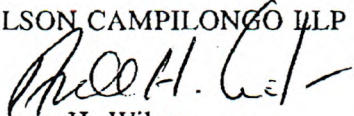
Your assumption that I have accepted service on behalf of any party to the referenced action is incorrect, unfounded and borders on the absurd. I thought it obvious that my letter was an offer of the opportunity to abandon this litigation before service of process was accomplished, in an effort to avoid the considerable expense that will accrue in defense of this unfounded action, an expense which you and your client will ultimately bear.

It is truly ludicrous for you to assert that Mr. Armstrong's flight from California was brought about by any unlawful actions of "Scientology's principals and agents." You know that Mr. Armstrong fled California to avoid being arrested for contempt of an order issued by the Superior Court of the State of California, County of Marin.

I fail to see what connection, if any, your letter of February 12 and 14 has to Mr. Armstrong's claimed residence in the State of Nevada. Perhaps you could enlighten me.

Very truly yours,

WILSON CAMPILONGO LLP


 Andrew H. Wilson

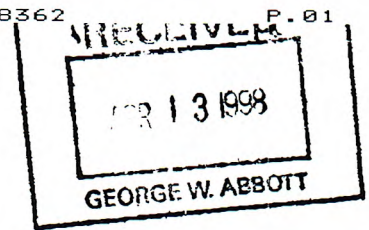
AHW-3059.LTR

Post-it® Fax Note	7671	Date	1/8/98	# of pages	1
To	GERRY ARMSTRONG	From	George A ABBOTT		
Co./Dept.		Co.			
Phone #	604/795-5852	Phone #	702/782-2302		
Fax #	604/795-7032	Fax #	702/782-8362		

WILSON CAMPILONGO LLP

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 (415) 391-3900
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ANDREW H. WILSON



April 7, 1998

Hon. Vernon F. Smith
 Courtroom F
 Marin County Superior Court
 Hall of Justice, Civic Center
 San Rafael, CA 94903

Post-it® Fax Note	7671	Date	4/14/98	# of pages	3
To	Gerry ARMSTRONG	From	GW ABBOTT		
Co./Dept.		Co.			
Phone #	604/795-5852	Phone #	702/782-2302		
Fax #	604/795-7032	Fax #	702/782-8362		

Re: CSI v. Armstrong
Marin County Superior Court Case #152229

Your Honor:

Enclosed herewith for your signature is a Bench Warrant which resulted from an Order of Contempt which Judge Thomas issued in the above case on February 20, 1998. The Order of Contempt is attached to the Bench Warrant as Exhibit A. This is the second Order of Contempt issued against the Defendant. Both contempt orders arose out of Armstrong's breach of on Order of Permanent Injunction entered by Judge Thomas on October 17, 1995. I used the same form of Bench Warrant as in the previous instance of contempt and enclose for your reference a copy of that Bench Warrant for comparison.

Assuming you find that the papers are in order, I would appreciate your executing the Bench Warrant and having your clerk inform my office of the same. Thank you for your assistance.

Very truly yours,

WILSON CAMPILONGO LLP

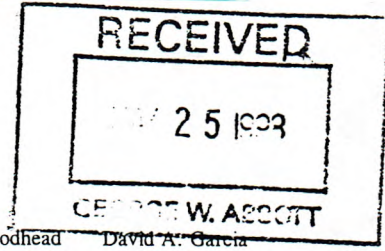
Andrew H. Wilson

AHW-5053.ltr

cc: Gerald Armstrong
 c/o George Abbot, Esq.
 P.O. Box etc
 Minden, Nev

HALE, LANE, PEEK, DENNISON, HOWARD,
ANDERSON AND PEARL

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Elissa F. Cadish	James Newman
Pauline Ng Lee	Dania M. Severson
Kimberly A. Chatlin	W. West Allen
Timothy A. Lukas	Patrick J. Reilly
Jeanette E. McPherson	Noah G. Allison

Anrew Pearl - Of Counsel
Roy Farrow - Of Counsel
Linda E. Johnson - Of Counsel

May 21, 1998

VIA FACSIMILE AND U.S. MAIL
(702) 782-8362

George W. Abbott, Esquire
2245-B Meridian Boulevard
P.O. Box 98
Minden, NV 89423

**Re: Gerald Armstrong v. Church of Scientology, et al.
Our File No. 13860-0001**

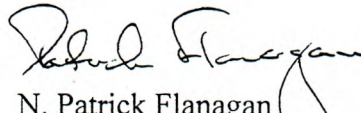
Dear Mr. Abbott:

My office has tried to reach you by telephone on numerous occasions but have been unsuccessful.

Pursuant to the Fed. R. Civ. P.26(f), the parties to a civil action are to meet and confer with each other and to exchange documents which each side presently possess with a view to resolve discovery disputes prior to trial. Please contact my office upon receipt of this letter so that we may be able to schedule a convenient date and time for the conference.

If there is any other matter with which I can be of assistance to you, please do not hesitate to contact me at your earliest convenience.

Sincerely,


N. Patrick Flanagan

NPF:ngg

GEORGE W. ABBOTT, CHARTERED
Law Offices

FAX TRANSMITTAL SHEET

DATE: July 27, 1998TO: Gerald Armstrong(604) 795-7032FROM: MaryNumber of Pages including transmission sheet: 28

Please call immediately if you do not receive all pages
of this transmission.

ADDITIONAL NOTES:

George hasn't seen these documents yet. He will be returning this
evening.

This facsimile is intended only for use of the addressee above and may contain legally privileged and/or confidential information. If you are not the intended recipient of this facsimile, you are hereby notified that any dissemination, distribution or copying of this facsimile is strictly prohibited. If you have received this facsimile in error, please immediately notify us by telephone and return the original facsimile to us at the address above via the U.S. postal service.

**HALE LANE PEEK
DENNISON HOWARD AND ANDERSON**

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Sonia E. Taggart
Torry R. Somers
Patrick J. Reilly
Mark E. Trafton
Noah G. Allison

Andrew Pearl - Of Counsel
Roy Farrow - Of Counsel
Linda E. Johnson - Of Counsel

July 28, 1998

VIA FACSIMILE

1-702-782-8362

George Abbott, Esquire
Post Office Box 98
Minden, Nevada 89423

**Re: Armstrong v. Church of Scientology International, et al
Our File Number 13860-0001**

Dear Mr. Abbott:

On Monday, July 20, 1998, I was informed by your secretary, Mary, that the August 3, 1998 date set for the Plaintiff's deposition was inconvenient because you were not in the State of Nevada. I asked Mary for acceptable dates and she promised to pass the request on inasmuch as you were on your way to California at the time. I called several times to propose alternate dates but did not receive a response until we spoke last Friday, July 24, 1998. During our lengthy conversation you stated several times that Mr. Armstrong would not appear for any deposition so long as the two arrest warrants were outstanding. Regrettably, this required me to file the Motion to Compel Discovery.

I have recently received Notices setting depositions of various individuals for the first two weeks of August. This is most curious given your previous claims of unavailability. Incredibility aside, these Notices are improper, vexatious and constitute a transparent attempt to avoid the Judge Reed's orders.

Judge Reed's Orders on the Defendants' Motions to Dismiss limit the issue to be determined at the August 20, 1998, hearing to Gerald Armstrong's residency. This is the sole support of his claim of subject matter jurisdiction. The individuals you have noticed for deposition have absolutely no evidence to give on the issue of Gerald Armstrong's residency in Nevada. First, David Miscavige

LAS VEGAS OFFICE: 2300 West Sahara Avenue, Eighth Floor, Box 8, Las Vegas, Nevada 89102
(702) 222-2500 or (702) 362-5118 • Facsimile (702) 365-6940
CARSON CITY OFFICE: 777 East William Street, Suite 201, Post Office Box 2620, Carson City, Nevada 89702
(702) 684-6000 • Facsimile (702) 684-6001

George Abbott, Esquire
July 28, 1998
Page 2

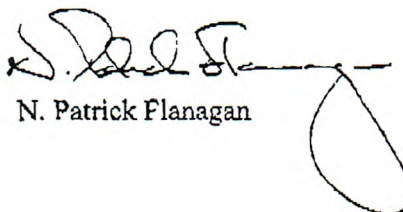
HALE LANE PEEK DENNISON
HOWARD AND ANDERSON

has been dismissed out of this case by Judge Reed. He has absolutely no evidence as to the whereabouts of Mr. Armstrong. It is clear that, despite Judge Reed's order, Mr. Armstrong intends to continue to harass Mr. Miscavige. Second, there is no evidence that Mr. Rinder has any knowledge or information as to Mr. Armstrong's residency. Nothing in his declaration indicates he has any information about Mr. Armstrong's residency. There is no other information which would lead you to find he had any evidence to give on the issue before this Court. Third, you have noticed the deposition of "WGERT." Could you enlighten me as to whom *that* is?

The issue to be resolved is simple: Was Mr. Armstrong a Nevada resident at the time he filed this complaint? The best source is Mr. Armstrong himself and any documents (such as driver license applications) which support his position. That is the sole subject upon which we wish to depose Mr. Armstrong. No one you have noticed has any better information on that subject.

We demand withdrawal of the Notices of Depositions for Messrs. Miscavige, Rinder and WGERT by 5:00 p.m., Wednesday, July 29, 1998. If these Notices are not withdrawn, we will have no choice but to obtain a protective order and seek sanctions to recover our related expenses.

Sincerely,

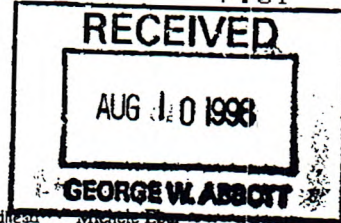


N. Patrick Flanagan

NPF:ngg

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Andrew Pearl - Of Counsel
Roy Farrow - Of Counsel
Linda E. Johnson - Of Counsel

August 7, 1998

Via Facsimile and U.S. Mail
(702) 782-8362

George W. Abbott, Esquire
2245-B Meridian Boulevard
P.O. Box 98
Minden, NV 89423

Post-it® Fax Note	7671	Date	8/10/98	# of pages	7
To	Gerald Armstrong		From	GW Abbott	
Co./Dept.			Co.		
Phone #	604/795-5852		Phone #		
Fax #	604/795-7032		Fax #	702/782-8362	

**Re: Gerald Armstrong v. Church of Scientology, et al.
Our File No. 13860-0001**

Dear Mr. Abbott:

Before my clients are required to incur additional substantial attorneys' fees and costs in preparation for the evidentiary hearing scheduled for August 20, 1998, I hereby request that you voluntarily dismiss this action forthwith. By now it is increasingly obvious that your client cannot meet his burden of showing that, as of November 24, 1997, the date on which his lawsuit was filed, he had in fact established a permanent domicile in the State of Nevada. Accordingly, the district court lacks subject matter jurisdiction over this lawsuit. Both your client and you have an obligation to withdraw claims once it becomes reasonably clear that they cannot be maintained.

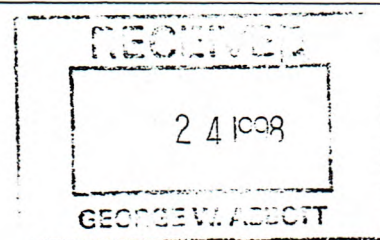
We therefore urge you to dismiss this action now, before the remaining defendants are required to expend additional sums unnecessarily. If we are required to incur such expenses, we will strongly consider seeking sanctions in such amounts against the plaintiff and his counsel.

Sincerely,

N. Patrick Flanagan

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(702) 362-5118 • Facsimile (702) 365-6940
CARSON CITY OFFICE: 777 East William Street, Suite 201, Post Office Box 2620, Carson City, Nevada 89702
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N. PATRICK FLANAGAN

E-MAIL: FLANAGAN @ HLPDHAP.USA.COM

August 21, 1998

VIA U.S. MAIL AND FACSIMILE: (702)782-8362

George W. Abbott, Esq.
2245-B Meridian Boulevard
P.O. Box 98
Minden, NV 89423

Re: Gerald Armstrong v. Church of Scientology, et al.
Our File No. 13860-0001

Dear Mr. Abbott:

Now that the magistrate judge has reaffirmed that Mr. Armstrong must appear for his deposition on Monday, August 24, 1998, we request that you confirm immediately that Mr. Armstrong, in fact, will appear and present himself for deposition on that date. Lead counsel for CSI and RTC have made plans to travel to Reno from out of state this weekend in order to prepare for and conduct the deposition. This will incur considerable amounts of fees and expenses for the defendants. If Mr. Armstrong does not appear, we will seek not only dismissal of the action, but sanctions including such fees and expenses.

Once again, we request that you dismiss this action forthwith, thereby making it unnecessary for the defendant to incur increasing fees and costs to defend this action. You certainly must be aware by now -- even if you were not previously aware -- that Mr. Armstrong cannot establish permanent domicile in Nevada in November 1997, or for that matter at any time. Accordingly, it is incumbent upon you as an officer of the court to withdraw this case.

We request that you inform us by 3:00 p.m. this afternoon that you have voluntarily dismissed this action. In the alternative, please confirm to us by that time that Mr. Armstrong will appear for deposition at 10:00 a.m. Monday, August 24, 1998.

Sincerely,

A handwritten signature in cursive script, appearing to read "N. Patrick Flanagan".

N. Patrick Flanagan

LAS VEGAS OFFICE: 2300 West Sahara Avenue, Eighth Floor, Box 8, Las Vegas, Nevada 89102
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**HALE LANE PEEK
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Gregg R. Verneys

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James Newman
W. West Allen
Dania M. Severson
Sonia E. Taggart
Torry R. Somers
Patrick J. Reilly
Mark E. Trafton
Noah G. Allison

Andrew Pearl - Of Counsel
Roy Farrow - Of Counsel
Linda E. Johnson - Of Counsel

August 27, 1998

VIA U.S. MAIL AND FACSIMILE: 702-782-8362

George W. Abbott, Esq.
Law Offices
2245-B Meridian Boulevard
P.O. Box 98
Minden, NV 89423-0098

**Re: Gerald Armstrong v. Church of Scientology, Int'l. et al.
Case No. CV-N-97-00670 ECR(RAM)
Our File No. 13860-0001**

Dear Sir:

Enclosed for your records is the Stipulated Discovery Plan and Scheduling Order signed by you on behalf of the Plaintiff and myself on behalf of the Defendants (DKT # 39). I direct your attention to the second page of this Order, subpart two, which states, *inter alia*:

Inasmuch as the motions challenge the jurisdiction of the court not only over the subject matter of the lawsuit, but over the defendants personally, defendants submit it would be unduly burdensome to require them to engage in initial disclosures and discovery while the motions are still pending. Indeed, no party has commenced discovery of any kind. While plaintiff, of course, disagrees with defendants['] position as to the merits of the pending motions, plaintiff does agree that disclosure and discovery shall abide decision of the pending motions.

LAS VEGAS OFFICE: 2300 West Sahara Avenue, Eighth Floor, Box 8, Las Vegas, Nevada 89102
(702) 222-2500 or (702) 362-5118 • Facsimile (702) 363-6940
CARSON CITY OFFICE: 777 East William Street, Suite 201, Post Office Box 2620, Carson City, Nevada 89702
(702) 684-6000 • Facsimile (702) 684-6001

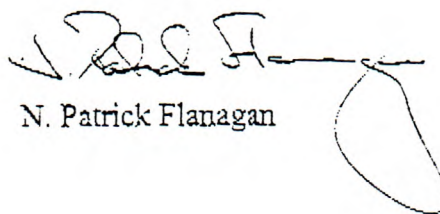
HALE LANE PEEK DENNISON
HOWARD AND ANDERSON

August 27, 1998
Page 2

Page 3 of the Stipulated Discovery Plan and Scheduling Order bears what appears to be your signature and that of the U.S. Magistrate Judge. I hope that clarifies the issue of a stay of discovery in this case pending resolution of our dispositive motions.

Should you have any other questions in this regard, please do not hesitate to contact me, in writing, at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "N. Patrick Flanagan", with a large, loopy flourish at the end.

N. Patrick Flanagan

NPF:mas

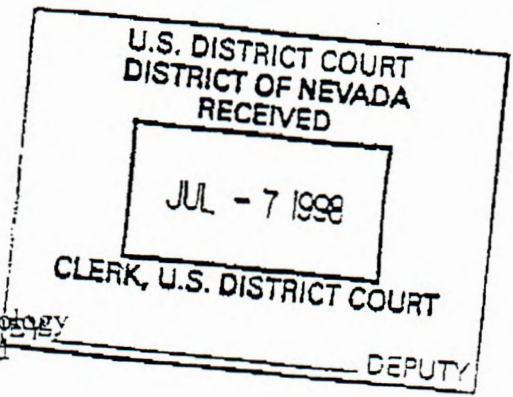
Enclosure

cc: (via facsimile only)
Hon. Robert McQuaid, Jr.
Sandy Rosen

Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl
100 West Liberty Street, 10th Floor
Reno, Nevada 89501

1 N. Patrick Flanagan Esquire
Nevada Bar No. 952
2 Hale Lane Peek Dennison Howard
and Anderson
3 100 West Liberty Street, Tenth Floor
P.O. Box 3237
4 Reno, Nevada 89505
Telephone: (702) 327-3000

5 Attorneys for Defendant Church of
6 Scientology International, Religious Technology
Center, Church of Scientology of Texas and
7 Cathy Norman



8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 GERALD ARMSTRONG,
11 Plaintiff.

CASE NO. CV-N-97-00670 ECR (RAM)

12 vs.

13 STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER
(Special Scheduling Review Requested)

14 DAVID MISCAVIGE and CATHY
NORMAN, individuals; CHURCH OF
15 SCIENTOLOGY INTERNATIONAL, a
California corporation; the RELIGIOUS
16 TECHNOLOGY CENTER, a California
corporation; the SEA ORGANIZATION,
17 a California based unincorporated entity;
and the CHURCH OF SCIENTOLOGY
18 OF TEXAS, a Texas corporation,

19 Defendants.

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FILED
JUL 7 1998
U.S. DISTRICT COURT
DISTRICT OF NEVADA
RENO

21 The Plaintiff and counsel for Defendants, Church of Scientology International, Religious Technology
22 Center, Cathy Norman and Church of Scientology of Texas, have conducted a conference in accordance
23 with Fed. R. Civ. P. 26(f) and discussed the required topics. Defendants David Miscavige and Sea
24 Organization, not having been served and therefore not having appeared, did not attend the conference
25 Pursuant to LR 26-1(d) and (e), the parties submit the following Discovery Plan and Scheduling Order:

26 1. Settlement. The parties are not optimistic that this case will be settled in the near future. The
27 parties do not, at this time, request a settlement conference at the Court's earliest convenience to assist in
28 the early resolution of this case.

39

Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl
100 West Liberty Street, 10th Floor
Reno, Nevada 89501

1 2. Disclosures and Discovery to Abide Court's Resolution of Pending Motions to Dismiss. On
 2 April 20, 1998, Defendants Church of Scientology International, Religious Technology Center, Cathy
 3 Norman and Church of Scientology of Texas filed their Motions to Dismiss Complaint for Lack of Subject
 4 Matter Jurisdiction; lack of Personal Jurisdiction; Improper Venue; and Because Plaintiff is a Fugitive from
 5 Justice. The motions have been fully submitted. The Court has stated that it "has reviewed the said motions
 6 and they appear to be facially well taken." Inasmuch as the motions challenge the jurisdiction of the court
 7 not only over the subject matter of this lawsuit, but over the defendants personally, defendants submit that
 8 it would be unduly burdensome to require them to engage in initial disclosures and discovery while the
 9 motions are still pending. Indeed, no party yet has commenced discovery of any kind. While plaintiff, of
 10 course, disagrees with defendants position as to the merits of the pending motions, plaintiff does agree that
 11 disclosure and discovery shall abide decision of the pending motions. In the event that the motions to
 12 dismiss are denied in whole or in part, the parties shall submit an amended Stipulated Discovery Plan and
 13 Scheduling Order, setting forth specific calendar dates in accordance and consistent with the stipulations
 14 set forth below in this document.

15 3. Initial Disclosures. In the event the motions to dismiss are denied in whole or in part, the
 16 LR 26-1(a)2 Initial Disclosures will be due fifteen (15) days after the date of such order. The parties will
 17 serve the initial disclosures in accordance with Federal Rules of Civil Procedure.

18 4. Discovery Deadline. In the event the motions to dismiss are denied in whole or in part,
 19 discovery shall be completed by 180 days after such order. 13/99

20 5. Limitations on Discovery. In the event the motions to dismiss are denied in whole or in part,
 21 the parties believe that they can complete discovery within the ten deposition limit per side and within the
 22 forty interrogatory limit. Depositions shall be recorded by video graphic and stenographic means.

23 6. Amending Pleadings and Adding Parties. If the motions to dismiss are denied in whole or
 24 in part, the deadline for amending pleadings and adding parties shall be 90 days after such order. 10/98

25 7. Expert Disclosures. If the motions to dismiss are denied in whole or in part, expert
 26 disclosure shall be due no later than 120 days after such order and rebuttal expert disclosure shall be due
 27 no later than 30 days thereafter. 10/98

28 ///

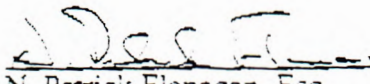
Hale, Lane, Peek, Dennison, Howard, Anderson and Pearl
100 West Liberty Street, 10th Floor
Reno, Nevada 89501

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8. Dispositive Motions. The parties request that the deadline for filing dispositive motions be extended to 30 days after the discovery deadline. 2/15/98

9. Pretrial Order. The parties request that the deadline for filing the Joint Pretrial Order be extended to 30 days after decision of the dispositive motions or further order of the court.

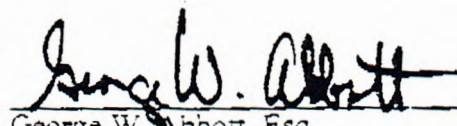
DATED this 6th day of July, 1998.



N. Patrick Flanagan, Esq.
Hale Lane Peek Dennison Howard and Anderson
100 West Liberty Street, 10th Floor
P.O. Box 3237
Reno, Nevada 89505
Telephone: (702) 327-3000

*Attorneys for Defendants
Church of Scientology International,
Religious Technology Center,
Church of Scientology of Texas and Cathy Norman*

DATED this 8th day of July, 1998.

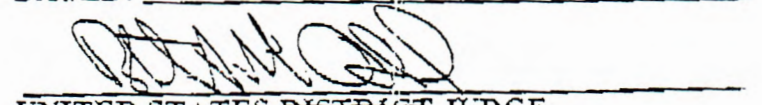


George W. Abbott, Esq.
2245-B Meridian Boulevard
P.O. Box 98
Minden, Nevada 89423
Telephone: (702) 782-2302

Attorney for Plaintiff

IT IS SO ORDERED:

DATED: 7-8-98



UNITED STATES DISTRICT JUDGE
Magistrate

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
DISTRICT OF NEVADA

LANCE S. WILSON
DISTRICT COURT EXECUTIVE/CLERK

RECEIVED

FEB 9 1999

GEORGE W. ABBOTT
BRUCE R. THOMPSON
FEDERAL BUILDING
& U.S. COURTHOUSE
ROOM: 301
400 South Virginia St.
Reno, Nevada 89501

To: CLERK, U.S. DISTRICT COURT OF APPEALS FOR THE NINTH CIRCUIT
USDC JUDGE EDWARD C. REED, JR.

USDC NO. CV-N-97-670-ECR (RAM) USCA NO. _____

STYLE OF CASE: GERALD ARMSTRONG v. DAVID MISCAVIGE, ET AL

Enclosed are documents &/or information relating to an appeal in
the above-referenced action.

Please acknowledge receipt on the enclosed copy of this letter.

xxx Appeal filed on 2/5/99.

xxx Judge/Magistrate appealed from: EDWARD C. REED, JR.

xxx **DOCKET FEE NOTIFICATION:**

xxx Appeal filing fee paid X No Yes.

 \$100 Docket Fee Paid \$5.00 Filing Fee Paid.

 Docket & Filing Fee Not Paid:

 U.S. Appellant Appellant/IFP.

 Certificate of Probable Cause: Granted Denied.

 Court file forwarded. (When CPC is denied, file is to
be sent to Court of Appeals.)

xxx Certified copy of Notice of Appeal, docket entries,
judgment &/or Order appealed #88

DEATH PENALTY.


 Court Reporter(s): _____

xxx Transcript designation/order form mailed to counsel.

 Certificate of Record Attached.

 Other: _____

LANCE S. WILSON, CLERK

By: 
WAYNE JULIAN

Deputy Clerk

GEORGE W. ABBOTT, CHARTERED
Law Offices

February 9, 1999

Ms. Cathy A. Catterson, Clerk
Ninth Circuit Court of Appeals
P. O. Box 193939
San Francisco, California 94119-3939

Re: Armstrong v. Miscavige, et al, No. 98-17024

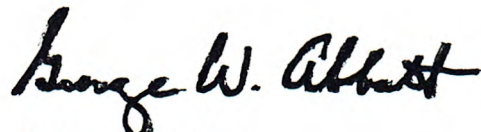
Dear Ms. Catterson:

Please file the enclosed document entitled, Plaintiff-Appellant's Motion to Permit the Parties to Consolidate Their Respective Briefs on Appeal, Cross-Appeal, in the above-captioned matter.

An extra copy is enclosed to be file-stamped and returned to this office in the self-addressed, stamped envelope provided.

Thank you.

Sincerely,



George W. Abbott

GWA:ma

Enclosure



CARSON CITY, NEVADA

Consolidated Municipality and State Capital

ROD B. BANISTER
Sheriff

Date: 3-24-99

TO: *Gerald Armstrong*
2245 B. Meridian Blvd.
Minden, NV 89423

RE: *Case # 99-1096 wallet*

Property belonging to you is being held by this agency. We have been unable to contact you.

If you do not contact this agency within 10 business days the property will be disposed of. Call Property/Evidence at 702-887-2020 ext 171G.

Christine B. Paige

Christine B. Paige 9185
Sheriff's Technician

cc: Dan Nuckolls
Records